

GERALD J. MCMAHON
ATTORNEY AT LAW

www.geraldjcmahon.com
gm@geraldjcmahon.com

11 BURNHAM COURT
SCOTCH PLAINS, NJ 07076
(908) 347-4670

375 GREENWICH STREET
NEW YORK, NY 10013
(212) 965-4259

April 22, 2022

By ECF

The Honorable Diane Gujarati
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Ralph DiMatteo, et al.
21 Cr. 466 (DG) (JRC)

Dear Judge Gujarati:

I write on behalf of my client, Ralph DiMatteo (“defendant” or “DiMatteo”), seeking a consent modification of his bail conditions to allow him to make and receive telephone calls to/from his wife, his daughter Maria and his son Angelo.

On February 4, 2022, Mr. DiMatteo was released from MDC pursuant to a bail order (ECF No. 218) which includes the following conditions:

1. A \$5 million bond, secured by 5 properties with equity in excess of \$2.44 million and six financially-responsible co-signers;
2. Home incarceration, with location monitoring (to be paid by the defendant), except for attorney visits, court appearances, and necessary medical treatment;
3. Surrender of passport (if any) and no new applications;
4. Strict pre-trial supervision as designated;
5. Travel limited to New York City, Long Island, and Union County, New Jersey;
6. No contact with victims, witnesses, or potential witnesses in this case;
7. No contact with any co-defendants unless in the presence of an attorney;
8. No contact with his nephew, Angelo DiMatteo, or any known members or associates of organized crime;
9. No phone usage except to attorney and then, only with agreed-upon Android phone subject to pre-trial/cyber monitoring;
10. Electronic devices in his home are limited to telephone landline, his wife’s iPhone

GERALD J. MCMAHON

Honorable Diane Gujarati
United States District Judge
April 22, 2022
Page Two

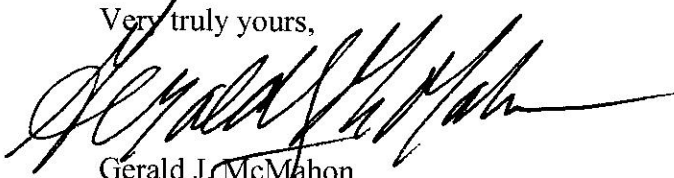
and one desktop computer, all of which may be monitored by Pretrial Services and searched by the government.

Since his release, defendant DiMatteo has been fully compliant with all his bail conditions.

If authorized by the Court, defendant would now be allowed to make telephone calls to, and receive telephone calls from, his wife, his daughter Maria, and his son Angelo – on his agreed-upon Android cell phone which is subject to pretrial/cyber monitoring. All other bail conditions would remain the same.

As stated, the government, by Assistant United States Attorney James P. McDonald, consents to this request.

Very truly yours,



Gerald J. McMahon

GJM:dlg
cc: All Counsel (By ECF)
Pretrial Services (By Email)